



U.S. Department of Justice

United States Attorney  
Southern District of New York

One St. Andrew's Plaza  
New York, New York 10007

February 26, 2020

**VIA ECF**

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: United States v. Todd Kozel  
19 Cr. 460 (KMW)

Dear Judge Wood:

I write respectfully to request an extension of the Government's response date to the defendant's pending motion for a Bill of Particulars and Motion to Dismiss (the "Motions"). Currently, the Government's Motion responses are due March 5, 2020, and defendant's replies are due March 19, 2020. (Dkt. No. 42).

As discussed in our previous request for an extension, the parties have entered into discussions that may result in the potential resolution of the charges in this case. Those discussions are ongoing, and include a meeting between counsel in New York the week of March 2, 2020. Accordingly, the Government respectfully requests that the Government's Motions response date be adjourned to April 3, 2020, and the defendant's reply date to April 17, 2020.

The Government further requests that the Court exclude time under the Speedy Trial Act through the briefing dates set by the Court. The undersigned has conferred with counsel for the defendant, and he consents to this request, including exclusion of time while the Motions are pending.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: /s/ Louis A. Pellegrino  
LOUIS A. PELLEGRINO  
Assistant United States Attorney  
Tel. (212) 637-2617  
louis.pellegrino@usdoj.gov